

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

ZEN JV, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-11195 (JKS)

(Jointly Administered)

**Re: Docket No. 415**

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’  
SECOND OMNIBUS MOTION FOR ENTRY OF AN ORDER  
(I) AUTHORIZING ASSUMPTION AND ASSIGNMENT OF CERTAIN  
EXECUTORY CONTRACTS AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to Steven Balasiano, solely in his capacity as the Liquidation Trustee (the “Liquidation Trustee”) of the Zen JV Liquidation Trust (the “Liquidation Trust”) hereby certifies as follows:

1. On October 3, 2025, Zen JV, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), filed the *Debtors’ Second Omnibus Motion for Entry of an Order (I) Authorizing Assumption and Assignment of Certain Executory Contracts and (II) Granting Related Relief* [Docket No. 415] (the “Second Assumption Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Second Assumption Motion (the “Proposed Order”). Attached as Exhibit 1

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

to the Proposed Order was a schedule identifying the executory contracts that are subject to the Second Assumption Motion (the “Assumed Contracts Schedule”).

2. Responses, if any, to the Second Assumption Motion were to be filed no later than 4:00 p.m. (prevailing Eastern Time) on October 17, 2025 (the “Response Deadline”).

3. Prior to the Response Deadline, ASM Tech Solutions LLC (“ASM”) informally objected to the assumption of the executory contract between ASM and Monster Worldwide LLC listed on the Assumed Contracts Schedule (the “ASM Contract”).

4. Bold Holdings LLC, the purchaser for the executory contracts listed on the Assumed Contracts Schedule (the “Purchaser”), subsequently agreed with ASM not to assume the ASM Contract. Pursuant to Article XIII.A of the Combined Plan and Disclosure Statement, the ASM Contract is deemed rejected as of the Effective Date, October 14, 2025.

5. Accordingly, attached hereto as Exhibit A is a revised proposed form of order (the “Revised Proposed Order”), and attached thereto as Exhibit 1 is a revised schedule of executory contracts that omits the ASM Contract (the “Revised Assumed Contracts Schedule”).

6. A blackline comparison of the Revised Proposed Order marked against the Proposed Order filed with the Second Assumption Motion is attached hereto as Exhibit B.

7. Other than as set forth herein, the Liquidating Trustee has not received any other informal objections or responses to the Second Assumption Motion.

8. No formal objections or responses to the Second Assumption Motion have been filed.

**WHEREFORE**, counsel for the Liquidation Trustee respectfully requests that the Revised Proposed Order, substantially in the form attached hereto as Exhibit A, be entered at the earliest convenience of the Court.

Dated: November 10, 2025  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

/s/ Justin R. Alberto

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